Case 1:07-cv-04089-RJS

Document 28-2

Filed 11/30/2007

Page 1 of 6

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GENERAL CAPITAL PARTNERS, LLC,

Plaintiff,

ν.

1:07-CV-4089 (rjs/dfe)

LIBERTY RIDGE, LLC (f/k/a AMERICAN HERITAGE COMMUNITIES/LIBERTY VILLAGE, LLC),

ECF CASE



Defendant.

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Matthew G. Parisi, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name:

Samuel T. Towell

Firm Name:

Williams Mullen

Address:

1021 East Cary Street, P. O. Box 1320

City/State/Zip:

Richmond, VA 23218-1320

Phone Number:

804-783-6919

Fax Number:

804-783-6507

Samuel T. Towell is a member in good standing of the Bar of the State of Virginia.

There are no pending disciplinary proceedings against Samuel T. Towell in any State or Federal Court.

Dated:

November 30, 2007

City, State:

White Plains, New York

Respectfully sub

Matthew G. Parisi (MGP-2188)

BLEAKLEY PLATT & SCHMIDT, LLP

One North Lexington Avenue

White Plaints, New York 10601

Phone Number: 914-949-2700

Fax Number: 914-683-6956

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOHN WESTGATE,			
Plaintiff,			
-VS-			Case No: 1:07-cv-07986-PKL
ROEHRIG MARITIME, LI	LC,		
Defendant.		/	
STATE OF NEW YORK))SS		
COUNTY OF))		

AFFIDAVIT OF ROBERTA E. ASHKIN IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

Roberta E. Ashkin, being duly sworn, deposes and says as follows:

- 1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Howard M. Cohen as counsel <u>pro hac vice</u> to represent Plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
 - 3. I have known Howard M. Cohen since 2007.
 - 4. Howard M. Cohen is associated with the firm of O'Bryan Baun Cohen Kuebler in

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia, do hereby certify that

SAMUEL THURSTON TOWELL

was admitted to practice as an attorney and counsellor at the bar of this Court on October 31, 2005.

I further certify that so far as the records of this office are concerned, SAMUEL THURSTON TOWELL is a member of the bar of this Court in good standing.

Witness my hand and seal of said Court

This 8th day of November

A.D. 2007

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	_
GENERAL CAPITAL PARTNERS, LLC,	-
Plaintiff,	
v.	1:07-CV-4089 (rjs/dfe)
LIBERTY RIDGE, LLC (f/k/a AMERICAN HERITAGE COMMUNITIES/LIBERTY VILLAGE, LLC),	ECF CASE
Defendant.	_
	– MATTHEW G. PARISI ADMIT COUNSEL PRO HAC VICE

Matthew G. Parisi, being duly sworn, hereby deposes and says as follows:

- 1. I am counsel at Bleakley Platt & Schmidt, LLP, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Samuel T. Towell as counsel pro hac vice to represent Defendant in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February 7, 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Samuel T. Towell since June 2007.

County of New York

- 4. Mr. Towell is counsel at Williams Mullen in Richmond, Virginia.
- 5. I have found Mr. Towell to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Samuel T. Towell, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Samuel T. Towell, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Samuel T. Towell, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated:

November 30, 2007

City, State:

White Plains, New York

Respectfully submitted,

Matthew G. Parisi (MGP-2188)

BLEAKLEY PLATT & SCHMIDT, LLP

One North Lexington Avenue White Plaints, New York 10601 Phone Number: 914-949-2700

Fax Number: 914-683-6956

1522778v1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GENERAL CAPITAL PARTNERS, LLC,

Plaintiff,

ν.

1:07-CV-4089 (rjs/dfe)

LIBERTY RIDGE, LLC (f/k/a AMERICAN HERITAGE COMMUNITIES/LIBERTY VILLAGE, LLC),

ECF CASE

Defendant.

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Matthew G. Parisi, attorney for Liberty Ridge, LLC (f/k/a American Heritage Communities/Liberty Village, LLC), and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

Samuel T. Towell Williams Mullen

Firm Name: Address:

1021 East Cary Street, P. O. Box 1320

City/State/Zip:

Richmond, VÅ 23218-1320

Phone Number:

804-783-6919 804-783-6507

Fax Number: Email Address:

stowell@williamsmullen.com

is admitted to practice pro hac vice as counsel for Liberty Ridge, LLC (f/k/a American Heritage Communities/Liberty Village, LLC) in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

New York, New York

United States District/Magistrate Judge